

# EXHIBIT 6

**Mentzer, Stefan**

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**From:** Gretchen Wallace [Gretchen.Wallace@myfloridalegal.com]  
**Sent:** Wednesday, April 13, 2011 8:35 AM  
**To:** Mentzer, Stefan  
**Cc:** Cohen, Daniel; Daniel.Lake; Audette, Danielle  
**Subject:** RE: United States ex rel. Ven-A-Care of the Florida Keys v. Actavis Mid Atlantic LLC - Civil Action No. 08-10852-PBS  
**Attachments:** 11-04-13AHCATerms by Custodian.\_Titlesxlsx.xlsx

(See attached file: 11-04-13AHCATerms by Custodian.\_Titlesxlsx.xlsx)

Stefan,

Here is the spreadsheet responsive to your request in the email below.

Sincerely,

Gretchen H. Wallace  
Senior Assistant Attorney General  
Office of the Attorney General  
Medicaid Fraud Control Unit  
Phone: 850-414-3911 SunCom: 994-3600  
Fax: 850-487-0179 SunCom: 277-9475  
E-mail: Gretchen.Wallace@myfloridalegal.com

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From: "Mentzer, Stefan" <smentzer@ny.whitecase.com>  
To: "Gretchen Wallace" <Gretchen.Wallace@myfloridalegal.com>  
Cc: "Cohen, Daniel" <daniel.cohen@ny.whitecase.com>, "Daniel.Lake" <Daniel.Lake@ahca.myflorida.com>, "Audette, Danielle" <daudette@ny.whitecase.com>  
Date: 04/08/2011 06:25 PM  
Subject: RE: United States ex rel. Ven-A-Care of the Florida Keys v. Actavis Mid Atlantic LLC - Civil Action No. 08-10852-PBS

Gretchen,

Please provide breakouts showing, for each document custodian, the number of documents resulting from each proposed search term. We may be able to eliminate certain search terms and/or document custodians and thereby reduce

the number of documents to review and produce. To facilitate this, please also provide the names and positions of the document custodians in the database.

Moreover, please respond to the other issues raised in my April 6 e-mail, including whether the state can simply produce the entire database.  
Regards,

Stefan

Stefan Mentzer  
White & Case LLP  
1155 Avenue of the Americas  
New York, New York 10036  
Telephone: + 1 212 819 8705  
Fax: + 1 212 354 8113  
smentzer@whitecase.com

-----Original Message-----

From: Gretchen Wallace [mailto:Gretchen.Wallace@myfloridalegal.com]  
Sent: Friday, April 08, 2011 6:01 PM  
To: Mentzer, Stefan  
Cc: Cohen, Daniel; Daniel.Lake; Audette, Danielle  
Subject: RE: United States ex rel. Ven-A-Care of the Florida Keys v. Actavis  
Mid Atlantic LLC - Civil Action No. 08-10852-PBS

Dear Stefan:

This email is in partial response to your latest proposal set forth in your email below.

The search terms you requested be applied to the existing database was completed; there were 196,000 documents responsive to the key search term hits. Accordingly, the estimate obtained just to review these documents is as follows:

As requested, below is the estimate for the cost to review 196,000 documents in response to the 3rd Party subpoena. We are providing a three, six and nine month estimates to complete the review.

3 months:

- 8 hour work day
- 60 documents per hour

|-----+-----+-----|

Service	Unit Cost	Total Price
Reviewers (7)	\$50.00 per hour	\$168,000.00
Review Managers (2)	\$52.00 per hour	\$49,920.00
Project Manager (1)	\$175.00 per hour	\$84,000.00
		Total: \$301,920.00

6 months:

- 8 hour work day
- 60 documents per hour

Service	Unit Cost	Total Price
Reviewers (4)	\$50.00 per hour	\$192,000.00
Review Managers (1)	\$52.00 per hour	\$49,920.00
Project Manager (1)	\$175.00 per hour	\$84,000.00
		Total: \$325,920.00

9 months:

- 8 hour work day
- 60 documents per hour

Service	Unit Cost	Total Price
Reviewers (3)	\$50.00 per hour	\$216,000.00
Review Managers (1)	\$52.00 per hour	\$74,880.00
Project Manager (1)	\$175.00 per hour	\$63,000.00
		Total: \$353,880.00

The folders of State Plan Amendments have not yet been received. Once I get them, I will provide you with an estimate of review time and any associated costs of production. I will be out of the office on Monday and back in the office on Tuesday. I will await your response to this cost estimate and if you want to set up another meet and confer concerning your current proposals, I am available any day next week except Monday.

Gretchen H. Wallace  
Senior Assistant Attorney General  
Office of the Attorney General  
Medicaid Fraud Control Unit  
Phone: 850-414-3911 SunCom: 994-3600  
Fax: 850-487-0179 SunCom: 277-9475  
E-mail: Gretchen.Wallace@myfloridalegal.com

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From: "Mentzer, Stefan" <smentzer@ny.whitecase.com>  
To: "Gretchen Wallace" <Gretchen.Wallace@myfloridalegal.com>  
Cc: "Audette, Danielle" <daudette@ny.whitecase.com>, "Cohen, Daniel" <daniel.cohen@ny.whitecase.com>, "Daniel.Lake" <Daniel.Lake@ahca.myflorida.com>  
Date: 04/08/2011 12:33 PM  
Subject: RE: United States ex rel. Ven-A-Care of the Florida Keys v.  
Actavis Mid Atlantic LLC - Civil Action No. 08-10852-PBS

Gretchen,

I am following up to see if the state has a response to these proposals below  
-- please let me know. Thanks,

Stefan

Stefan Mentzer  
White & Case LLP  
1155 Avenue of the Americas  
New York, New York 10036  
Telephone: + 1 212 819 8705  
Fax: + 1 212 354 8113  
smentzer@whitecase.com

-----Original Message-----

From: Mentzer, Stefan

Sent: Wednesday, April 06, 2011 11:56 AM

To: 'Gretchen Wallace'

Cc: Audette, Danielle; Cohen, Daniel; Daniel.Lake

Subject: United States ex rel. Ven-A-Care of the Florida Keys v. Actavis Mid

Atlantic LLC - Civil Action No. 08-10852-PBS

Gretchen,

To follow up on our conversation yesterday, it is our understanding that Florida has collected a folder of relevant portions of the Medicaid state plans and amendments (including some but not all correspondence with CMS). Also, in connection with the pending state case, Florida has developed a database containing the documents of a number of custodians (I think you mentioned twenty or so, including Jerry Wells) who are likely to have documents responsive to the subpoena.

We propose the following:

1. Please produce a copy of the folder described above this week.
2. I am attaching a list of search terms that we are asking Florida to run for all custodians and all time periods in the document database described above. Please let me know the number of documents that result from each of these search terms and the expected time frame for producing these documents. Alternatively, has the state completed a privilege review of its entire document database? If so, then we ask that the state simply produce the database in its entirety.
3. At this time, we are not asking the state to search for documents outside of items 1 and 2 described above. We reserve the right to request additional documents upon receipt and review of the state's production.

As discussed, the state will provide us with an estimate of the cost of producing these documents. However, as I mentioned, Sandoz does not agree to pay for the costs or expenses associated with the state's production of documents responsive to the subpoena. There is no requirement under the federal rules that a requesting party reimburse a subpoenaed party's expenses, and moreover as reflected in my March 24 letter, Sandoz has made substantial good-faith efforts to review the prior productions made by Florida and to narrow the scope of the documents being requested under the subpoena. In addition, the state appears already to have done most of the legwork in collecting responsive documents for purposes of its state action,

and the additional burden of running search terms and producing documents responsive to the subpoena is minimal.

I am happy to discuss these issues further if you have any questions or comments. Regards,

Stefan

Stefan Mentzer  
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New York, New York 10036  
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Fax: + 1 212 354 8113  
smentzer@whitecase.com

-----Original Message-----

From: Gretchen Wallace [mailto:Gretchen.Wallace@myfloridalegal.com]  
Sent: Friday, April 01, 2011 4:27 PM  
To: Mentzer, Stefan  
Cc: Cohen, Daniel; Daniel.Lake; Audette, Danielle  
Subject: RE: Sandoz subpoena - Letter from Stefan Mentzer

I will call you at 10 est on Tuesday. In case you need it, my direct line is 850 414 3911. Thanks.

Gretchen H. Wallace  
Senior Assistant Attorney General  
Office of the Attorney General  
Medicaid Fraud Control Unit  
Phone: 850-414-3911 SunCom: 994-3600  
Fax: 850-487-0179 SunCom: 277-9475  
E-mail: Gretchen.Wallace@myfloridalegal.com

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From: "Mentzer, Stefan" <smentzer@ny.whitecase.com>  
To: "Gretchen Wallace"  
<Gretchen.Wallace@myfloridalegal.com>  
Cc: "Daniel.Lake" <Daniel.Lake@ahca.myflorida.com>,  
"Audette,  
Danielle" <daudette@ny.whitecase.com>, "Cohen, Daniel"  
<daniel.cohen@ny.whitecase.com>  
Date: 04/01/2011 04:24 PM  
Subject: RE: Sandoz subpoena - Letter from Stefan  
Mentzer

I am available at 10:00 am on Tuesday -- please let me know if that works for you. The number to call is 212 819 8705. Regards,

Stefan

Stefan Mentzer  
White & Case LLP  
1155 Avenue of the Americas  
New York, New York 10036  
Telephone: + 1 212 819 8705  
Fax: + 1 212 354 8113  
smentzer@whitecase.com

-----Original Message-----

From: Gretchen Wallace [mailto:Gretchen.Wallace@myfloridalegal.com]  
Sent: Friday, April 01, 2011 4:21 PM  
To: Mentzer, Stefan  
Cc: Daniel.Lake; Audette, Danielle  
Subject: RE: Sandoz subpoena - Letter from Stefan Mentzer

Monday is not good for me, but anytime Tuesday except for 3:p.m.-3:30 p.m. is fine. Just give me a number to call. Thanks.

Gretchen H. Wallace  
Senior Assistant Attorney General  
Office of the Attorney General  
Medicaid Fraud Control Unit  
Phone: 850-414-3911 SunCom: 994-3600  
Fax: 850-487-0179 SunCom: 277-9475  
E-mail: Gretchen.Wallace@myfloridalegal.com

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From:	"Mentzer, Stefan"
<smentzer@ny.whitecase.com>	
To:	"Gretchen Wallace"
<Gretchen.Wallace@myfloridalegal.com>	
Cc:	"Daniel.Lake"
<Daniel.Lake@ahca.myflorida.com>, "Audette, Danielle" <daudette@ny.whitecase.com>	
Date:	04/01/2011 04:14 PM
Subject:	RE: Sandoz



subpoena - Letter from  
Stefan  
Mentzer

Gretchen,

Please let me know if you are available for a telephone conference on  
Monday  
to discuss the issues related to the subpoena. Regards,

Stefan

Stefan Mentzer  
White & Case LLP  
1155 Avenue of the Americas  
New York, New York 10036  
Telephone: + 1 212 819 8705  
Fax: + 1 212 354 8113  
smentzer@whitecase.com

-----Original Message-----

From: Gretchen Wallace [mailto:Gretchen.Wallace@myfloridalegal.com]  
Sent: Friday, April 01, 2011 4:10 PM  
To: Audette, Danielle  
Cc: Daniel.Lake; Mentzer, Stefan  
Subject: Re: Sandoz subpoena - Letter from Stefan Mentzer

Dear Ms. Audette and Mr. Mentzer:

Attached is our reply to Mr. Mentzer's letter dated March 24, 2011.

Sincerely,

Gretchen H. Wallace  
Senior Assistant Attorney General  
Office of the Attorney General  
Medicaid Fraud Control Unit  
Phone: 850-414-3911 SunCom: 994-3600  
Fax: 850-487-0179 SunCom: 277-9475  
E-mail: Gretchen.Wallace@myfloridalegal.com

(See attached file: 11-04-01WallaceLtr.Mentzer.pdf)

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material from any computer.

From: "Audette,  
Danielle"  
<daudette@ny.whitecase.com>  
To: "Gretchen  
Wallace"  
<Gretchen.Wallace@myfloridalegal.com>,  
"Daniel.Lake" <Daniel.Lake@ahca.myflorida.com>  
Cc: "Mentzer,  
Stefan"  
<smentzer@ny.whitecase.com>  
Date: 03/24/2011  
03:10 PM  
Subject:  
Sandoz subpoena -  
Letter from  
Stefan  
Mentzer

Counsel,

Please see the attached letter from Stefan Mentzer.

Regards,  
Dani Audette  
Associate  
Commercial Litigation Practice  
White & Case LLP  
1155 Avenue of the Americas  
New York, NY 10036  
(212) 819-8902  
daudette@whitecase.com

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hours of 9:30am - 5:30pm (EST). Any other time please call (212) 819-7664.  
Please then delete the e-mail and any copies of it. Thank you.

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(See attached file: 3-24-2011 Sandoz Ltr to FL.pdf)

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correspondence to me via email may be subject to disclosure.

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=====

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(See attached file: smm- (VAC) list of proposed search terms for florida.DOC)

Please note that Florida has a broad public records law, and that all correspondence to me via email may be subject to disclosure.

=====

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others. Please notify the sender that you have received this e-mail in error by replying to the e-mail or by telephoning (212) 819-8200 during the hours of 9:30am - 5:30pm (EST). Any other time please call (212) 819-7664. Please then delete the e-mail and any copies of it. Thank you.

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Custodian	Title	(blank)	"Average Manufacturer Price"	"Average Wholesale Price"	"Centers for Medicare and Medicaid Services"	"Estimated Acquisition Cost"	"Health Care Financing Administration"	"Myers and Stauffer"	"Provider Synergies"	"Reimbursement for drugs"	"State Plan"	"Wholesale Acquisition Cost"	4.19(b)	4.19B	4.19- B	Abt	acqui* w/5 cost*	AMP	AWP	CMS	EAC	HCFA	pharmac* w/5 reimb*	SPA	WAC	Grand Total
Strowd, Alan	Contract Management: Bureau Chief	113,689	63	262	4,167	103	473	70	160	12	3,660	60	9	2	9	40	452	1,407	650	22,190	263	2,499	638	630	463	151,971
Wells, Anne	Pharmacy Services: Bureau Chief	74,793	488	701	1,764	213	96	41	2,075	75	2,334	346	47	35	47	29	1,347	1,498	3,012	10,271	300	497	2,129	583	2,074	104,795
Yon, Ken	Medicaid Program Integrity: Case Manager. Former Pharmacy Services	68,339	66	105	1,170	28	210	18	8	13	984	23	1		1	7	233	669	165	8,080	68	467	376	108	73	81,212
Pharmacy GroupShare	N/A	20,488	480	694	960	208	337	8	1,290	89	1,022	230	69	11	69	57	676	1,571	1,484	5,027	259	750	1,875	295	1,028	38,977
Barnes, Linda	Pharmacy Services: Pharmacist (F)	26,853	155	246	467	51	43	19	1,006	45	509	116	5		5	13	362	773	1,074	3,334	109	263	703	130	909	37,190
Richard, Sybil	Deputy Secretary of Medicaid (F)	20,218	161	185	1,921	40	186	3	185	22	2,521	50	35	3	35	12	252	401	382	7,487	41	251	387	403	256	35,437
Aldridge, Ray	Pharmacy Services: Government Analyst II	24,739	55	210	179	55	11	2	928	9	186	45	6		6	57	297	1,349	1,772	1,699	120	333	405	75	1,644	34,182
Wiggins, Regina	Government Analyst II, Contracts, Research and Evaluation, Former Pharmacy Services	27,738	25	21	238	2	24		369	1	241	3				103	20	468	192	2,379	22	131	189	295	109	32,570
Ottinger, Jason	Quality Management: Analyst II. Former Medicaid Services and Pharmacy Services	23,173	11	38	538	13	68		145		519	16	34	7	34	27	49	728	119	3,858	152	184	115	182	54	30,064
Wells, Jerry	Pharmacy Services: Bureau Chief (F)	18,144	196	359	629	94	269	32	527	46	744	78	56	8	56	12	319	439	797	3,850	122	496	694	256	481	28,704
Morton, Sally	Contract Management: Bureau Chief (F)	18,096	4	53	560	25	286	1	31		454	5		1		18	73	47	111	3,618	58	1,141	101	73	23	24,779
Sharpe, Robert	Assistant Deputy Director Medicaid (F)	15,228	74	195	850	10	396	5	179	28	1,738	23	44	8	44	19	100	103	278	3,611	9	1,168	244	276	67	24,697
Donnelly, Marie	Pharmacy Services: Government Analyst II	14,352	142	243	1,004	126	122	18	343	43	1,026	68	84	25	84	11	292	478	484	3,184	171	302	523	368	390	23,883

Custodian	Title	(blank)	"Average Manufacturer Price"	"Average Wholesale Price"	"Centers for Medicare and Medicaid Services"	"Estimated Acquisition Cost"	"Health Care Financing Administration"	"Myers and Stauffer"	"Provider Synergies"	"Reimbursement for drugs"	"State Plan"	"Wholesale Acquisition Cost"	4.19( b)	4.19B	4.19- B	Abt	acqui* w/5 cost*	AMP	AWP	CMS	EAC	HCFA	pharmac* w/5 reimb*	SPA	WAC	Grand Total
Quinn, Ralph	Medicaid Program Analysis, Sr. Database Analyst	17,460	42	11	110	6	23	9	367		208	2				59	98	540	55	2,212	215	374	46	73	100	22,010
Frost-Penn, Darlene	Pharmacy Services, Staff Assistant	16,722	23	106	119	11	39		154		265	9				10	58	212	130	522	21	71	130	132	82	18,816
Bracko, Greg	Medicaid Program Analysis, Medicaid Healthcare Program Analyst	12,528	21	17	407		127	2	58		1,078	10	1		1	6	30	135	56	3,360	6	285	60	268	40	18,496
Kitchens, George	Pharmacy Services: Bureau Chief (F)	4,363	33	105	134	1	39		364	7	175	17	1	1	1	7	47	83	145	565	3	115	118	42	57	6,423
Crayton, Gary	Deputy Director Medicaid (F)	1,689		5	15	1	102				60					9	15	5	13	84		159	12	4	2	2,175
Mann, Jane	Pharmacy Services: Pharmacist (F)	1,277		2	7		2		2		4	1					6	4	26	43	1	14	4	2	14	1,409
Lipscomb, Stephen	Pharmacy Services:Pharmac ist (F)	714		4	6		1		3		1						1	1	20	36		8	26		4	825
McLeod, Susan	Pharmacy Services: Pharmacist (F)	214		1	1														1	2	1	16	1			237
Preacher, Sue	Pharmacy Services: Pharmacist (F)	76	1	1		4	5				2		2		2		4	2		6	2	21	6		1	135
Org Charts	N/A										1						1			1						3
Powers, Jim	Pharmacy Services: Pharmacist (F)	3																								3
<b>Grand Total</b>		<b>520,896</b>	<b>2,040</b>	<b>3,564</b>	<b>15,246</b>	<b>991</b>	<b>2,859</b>	<b>228</b>	<b>8,194</b>	<b>390</b>	<b>17,732</b>	<b>1,102</b>	<b>394</b>	<b>101</b>	<b>394</b>	<b>496</b>	<b>4,732</b>	<b>10,913</b>	<b>10,966</b>	<b>85,419</b>	<b>1,943</b>	<b>9,545</b>	<b>8,782</b>	<b>4,195</b>	<b>7,871</b>	<b>718,993</b>